

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

COACH, INC., a Maryland Corporation;  
COACH SERVICES, INC., a Maryland  
Corporation,  
Plaintiffs,  
vs.  
PEGASUS THEATER SHOP, an unknown  
business entity; SHERL STOCKING, an  
individual; and DOES 1-10, inclusive,  
Defendants.

) CASE NO. 12-CV-01631-MJP

) **DECLARATION OF MICHAEL  
MARCHAND IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT  
RE DEFENDANTS' LIABILITY  
FOR TRADEMARK  
INFRINGEMENT**

) **NOTE ON MOTION CALENDAR:  
July 19, 2013**

DECLARATION OF MARCHAND IN SUPPORT  
OF PLAINTIFFS' MOTION FOR PARTIAL  
SUMMARY JUDGMENT RE LIABILITY

**GORDON & REES LLP**  
121 SW Morrison Street, Suite 1575  
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Tel.: (503) 222-1075

## DECLARATION OF MICHAEL MARCHAND

I, Michael Marchand, declare as follows:

1. I am an attorney at Blakely Law Group, counsel for Plaintiffs Coach, Inc. and Coach Services, Inc., (collectively “Plaintiffs” or “Coach”) in the above-entitled action. I have personal knowledge of the matters set forth herein, and if called upon as a witness could competently testify thereto. I am admitted to appear in this matter *pro hac vice*.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Defendant Pegasus Theater Shop's (Stocking and Hunt Services) Responses to Coach's First Set of Special Interrogatories.

3. Attached hereto as **Exhibit 2** is a true and correct copy of Defendant Pegasus Theater Shop's (Stocking and Hunt Services) Amended Responses to Coach's First Set of Requests for Admissions.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the transcript of the FRCP 30(b)(6) deposition of Pegasus Theater Shop.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this June 14, 2013, in Hollywood, California.

/s/ Michael Marchand  
Michael Marchand

DECLARATION OF MARCHAND IN SUPPORT  
OF PLAINTIFFS' MOTION FOR PARTIAL  
SUMMARY JUDGMENT RELIABILITY

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